

**UNIVERSITY OF HOUSTON SYSTEM  
ADMINISTRATIVE MEMORANDUM**

**SECTION: Information Technology**

**NUMBER: 07.A.06**

**AREA: Computing Services**

**SUBJECT: E-Mail Retention**

---

1. PURPOSE

This policy is adopted in order to comply with state and federal law, to preserve e-mails which are state records of the University of Houston System (System) and its component universities, to demonstrate fiscal responsibility by eliminating the need for unnecessary computer file storage space, and to apply best practices for e-mail retention throughout the System.

2. SCOPE

This policy applies to

- A. All e-mail systems provided or funded (in part or in whole) by the System or a component university;
- B. All users and account holders of System or component university e-mail accounts; and
- C. All e-mail messages sent or received using System or component university e-mail systems.

3. POLICY

3.1. Non-Business Use of E-Mail or Electronic Media Services

The computers, electronic media and e-mail messaging services provided by the System or its component universities are primarily for business use. Limited, occasional, or incidental use of e-mail or electronic media (sending or receiving) for personal, non-business purposes is acceptable, provided that such use is done in a manner that does not negatively affect the systems' use for their business purposes. Personal, non-business related e-mail or electronic media messages are not university records and do not need to be retained.

3.2. Transitory Correspondence

- A. Most e-mail messages are created primarily for routine communication or information exchange that is of temporary usefulness which is not an integral part of the System or component university's recordkeeping system, i.e., they are not university records. These messages should be

considered transitory correspondence that do not have lasting value and should be:

1. Read and deleted; or
2. Read and retained on the active mail server for no longer than necessary or until their usefulness has ended (whichever occurs first), and then deleted; or
3. Read and retained on the active mail server or moved to other file locations when job requirements necessitate retention, and then deleted when their usefulness has ended.

B. Transitory correspondence is not essential to the fulfillment of the statutory obligations or to the documentation of System or component university functions. Examples of transitory correspondence are:

1. Routine messages
2. Telephone message notifications
3. Notices about internal meetings or events
4. Routing slips
5. Incoming letters or memoranda of transmittal that add nothing of substance to enclosures
6. Similar routine information used for communication, but not for the documentation, of a specific transaction
7. An inquiry about department course offerings or scheduling issues
8. Announcements, etc.

### 3.3 System/University/Business Records

When the contents of an e-mail message exhibit one or more of the following characteristics, it should be classified as a system/university/business record:

- A. Has operational value (required by a department to perform its primary function)
1. Administrative actions taken or planned
  2. Reports or recommendations

3. Policies, procedures, guidelines, rubrics, or templates
  4. Non-transitory communication pertaining to routine operation of policies, programs services or projects of the university or of a department
- B. Has legal or evidential value (required to be kept by law), such as a legal hold or investigation (see Section 3.9 below).
  - C. Has fiscal value (related to the financial transactions of the campus), required for financial reporting and audits.
  - D. Has historical significance (of long-term value to document past events). These messages may arise from exceptional age and/or some significant historical event.
  - E. Has vital value (critical to maintain to ensure operational continuity after a disruption or disaster). Vital records or information may fall into any one of the above value categories.
- 3.4. System/University/Business records, including messages and information, must be retained as noted in [SAM 03.H.01 – Records Retention](#), and in accordance with the Texas State Records Management Statutes. See in particular, [Section 1.1](#) on General Administrative Records.
- 3.5. To assist in the determination of whether an e-mail is a System, university or business record or is transitory in nature, see <http://www.uh.edu/emailretention>.
- 3.6. E-mail messages that are System/university/business records should:
- A. Be moved to dedicated storage on departmental/office networked file systems (the equivalent of an electronic filing cabinet); or
  - B. Be retained on the active e-mail server. The active e-mail server is a computer on the component university network that provides “post office” facilities for current users. It receives and stores incoming mail for users and forwards outgoing e-mail for delivery. Users are assigned individual “mailboxes” where incoming and outgoing e-mail messages are stored until deleted by the user.
  - C. Messages should be stored in a manner that can be retrieved easily by the university.

3.7. Classifying Messages

- A. Questions about the proper classification (transitory correspondence or System/university/business record) of a specific message, record or piece of information should be directed to the employee's manager or business administrator. If further assistance is needed in classifying information, the System Records Retention Officer should be contacted for assistance.
- B. The burden of determining whether a specific message is a System/university/business record should fall to the department responsible for being custodian of those records. For example, Human Resources are responsible for determining whether messages sent to Human Resources pertaining to employee relations are classified as university records.

3.8. Backup Files

All component university e-mail server administrators shall keep backup images of component university e-mail servers for no more than twelve (12) weeks. These backup images are for system restoration and disaster recovery purposes, and are not designed to facilitate retrieval of deleted messages.

3.9. Legal Holds

- A. When litigation against the System, its component universities or its employees is filed or threatened, the law imposes a duty upon the university to preserve all documents and records that pertain to the issues. When General Counsel is made aware of pending or threatened litigation, a legal hold directive will be issued to the legal custodians.
- B. A legal hold directive overrides this e-mail retention policy, as well as any records retention schedules that may have otherwise called for the transfer, disposal, or destruction of relevant documents, until the hold has been cleared by General Counsel.
- C. E-mail and accounts of separated employees that have been placed on legal hold status by General Counsel will be maintained by Information Technology Security until the hold is released.
- D. No employee who has been notified by General Counsel of a legal hold may alter or delete an electronic record that falls within the scope of that hold. An employee notified by General Counsel of a legal hold will be required to provide copies of the referenced electronic records that the employee has downloaded and saved or moved to some other storage account or device.

- E. When an open records request (or [Public Information Act](#) request, also known as a [Freedom of Information Act](#) Request) is pending, documents must be maintained while the request is pending.

4. ROLES AND RESPONSIBILITIES

4.1 All university e-mail users are expected to:

- A. Regularly check for new messages.
- B. Routinely secure messages that are System/university/business records in accordance with Section 3.3.
- C. Delete transitory correspondence as soon as its usefulness has ended.
- D. Retain a University/Business Record in accordance with Section 3.3 if the user is
  - 1. The sender or creator; or
  - 2. The only or main recipient; or
  - 3. The designated university custodian for that type of information.
- E. Not retain messages longer than required for their respective job purposes. When that need no longer exists, the message should be deleted.
- F. Review and utilize the information posted at <http://www.uh.edu/emailretention> to assist in the management of e-mail messages.

4.2 Component university information technology (IT) departments and all colleges/divisions/departments providing independent e-mail services will:

- A. Establish and publish standards for e-mail account administration, storage allocations, and automatic archiving of messages to users' local computer folders/files;
- B. Provide active e-mail server facilities in compliance with this policy for all university business;
- C. Provide the required end user training and help desk support;
- D. Manage server implementations of legal holds that are issued by General Counsel; and

- E. Suspend any automatic deletion processes that may be in place, as necessary, to preserve specific electronic messages, records and information that fall within the scope of the legal hold, and that reside on active e-mail servers.
- 4.3. Department heads and unit managers are responsible for notifying and providing message and records retention guidance to staff and faculty within their respective units. The guidance provided must be in accordance with this policy and the [Texas State Records Retention Schedule](#).
- 4.4. The System records retention officer appointed by the Chancellor is responsible for providing guidance to System personnel in ensuring compliance with state law with reference to the preservation of state records. Each campus has a records retention liaison to ensure component university compliance.
- 4.5. Originators and custodians of electronic messages, records, and information that are university/business records are responsible for:
  - A. Appropriately identifying and retaining such records in accordance with this policy and the [Texas State Records Retention Schedule](#); and,
  - B. Seeking assistance from their respective managers or college/division business administrators when unsure about how to categorize specific types of messages.
- 4.6. System/university employees who have been notified by General Counsel of a legal hold are responsible for preserving all messages, records, and information that fall within the scope of the hold that they have downloaded and/or stored locally.
- 4.7. In the event of litigation, the System chief information security officer will be the designated 30(b)(6) witness as defined by the Federal Rules of Civil Procedure.
- 5. RELATED INFORMATION
  - 5.1. For the Texas State Library Records Retention Schedule, visit <http://www.tsl.state.tx.us/slr/recordspubs/rrs4.html>.
  - 5.2. For the System Records Retention Schedule, visit [http://www.uh.edu/finance/references/Record\\_Retention/Retention\\_Schedule.pdf](http://www.uh.edu/finance/references/Record_Retention/Retention_Schedule.pdf).
  - 5.3. For information about the System Records Retention Policy (SAM 03.H.01), visit [SAM 03.H.01 – Records Retention](#).

6. REVIEW AND RESPONSIBILITY

Responsible Party: Associate Vice Chancellor for Information Technology

Review: Every three years on or before September 1

7. APPROVAL

Approved: Jim McShan  
Interim Vice Chancellor for Administration and Finance

Renu Khator  
Chancellor

Date: March 25, 2016

**REVISION LOG**

Revision Number	Approval Date	Description of Changes
1	06/12/2015	Initial version (Original document was MAPP 10.03.07)
2	03/25/2016	Changed the Section for SAM 07.A.06 from “Information Services” to “Information Technology.” No other changes were indicated by the Subject Matter Expert (SME)